

EXHIBIT 6

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----x

5 RUBY FREEMAN and WANDREA MOSS,

6 Plaintiffs,

7 Case No.

8 v. 24-cv-6563 (LJL)

9 RUDOLPH W. GIULIANI,

10 Defendant.

11 -----x

12 9:11 a.m.

December 31, 2024

13
14
15 VIRTUAL DEPOSITION of RYAN MEDRANO, a
16 Witness in the above entitled matter, taken
17 pursuant to Subpoena, before Stephen J. Moore, a
18 Registered Professional Reporter, Certified
19 Realtime Reporter and Notary Public of the State
20 of New York.
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25

<p style="text-align: right;">Page 2</p> <p>1 RYAN MEDRANO</p> <p>2 A P P E A R A N C E S:</p> <p>3</p> <p>4 WILLKIE FARR & GALLAGHER LLP</p> <p>5 Attorneys for Plaintiffs</p> <p>6 1875 K Street NW</p> <p>7 Washington, DC 20006</p> <p>8</p> <p>9 BY: AARON NATHAN, ESQ.</p> <p>10 - and -</p> <p>11 MAGGIE MacCURDY, ESQ.</p> <p>12 - and -</p> <p>13 MERYL GOVERNSKI, ESQ.</p> <p>14 - and -</p> <p>15 AMELIA DIAZ, ESQ.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 RYAN MEDRANO</p> <p>2 Exhibit 8 E-mail from Mr. Medrano to 148 15</p> <p>3 Mr. Ricci dated December 19,</p> <p>4 2023</p> <p>5</p> <p>6 Exhibit 9 Series of e-mail between Mr. 165 9</p> <p>7 Medrano and Mr. Ricci dated</p> <p>8 December 19, 2023</p> <p>9</p> <p>10 Exhibit 10 E-mail 170 24</p> <p>11</p> <p>12 Exhibit 11 E-mail from Heath Berger 210 24</p> <p>13 dated January 25, 2024, it's to</p> <p>14 Mr. Giuliani, et al.</p> <p>15</p> <p>16 Exhibit 12 E-mail from Ryan Medrano to 213 12</p> <p>17 Joe Ricci with attachment</p> <p>18</p> <p>19 Exhibit 13 E-mail 217 8</p> <p>20</p> <p>21 Exhibit 14 E-mail from Maria Ryan 219 19</p> <p>22</p> <p>23 Exhibit 15 E-mail from Maria Ryan with 226 17</p> <p>24 attachment</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 RYAN MEDRANO</p> <p>2 EXAMINATION BY PAGE</p> <p>3 MR. NATHAN 9 14</p> <p>4</p> <p>5 E X H I B I T S</p> <p>6</p> <p>7 Exhibit 1 E-mail 123 13</p> <p>8</p> <p>9 Exhibit 2 E-mail 127 19</p> <p>10</p> <p>11 Exhibit 3 E-mail regarding subpoena 130 6</p> <p>12</p> <p>13 Exhibit 4 December 4, 2023 e-mail from 133 16</p> <p>14 Joe Ricci to</p> <p>15 Ryanmedrano@Giulianipartners.co</p> <p>16 m with attachment</p> <p>17</p> <p>18 Exhibit 5 E-mail dated December 7, 2023 136 3</p> <p>19 from Joe Ricci to Rudy Giuliani</p> <p>20 and Maria Ryan</p> <p>21</p> <p>22 Exhibit 6 Bank statements for Giuliani 141 16</p> <p>23 Communications</p> <p>24 Exhibit 7 E-mail exchange between Mr. 145 9</p> <p>25 Medrano and Mr. Ricci</p>	<p style="text-align: right;">Page 5</p> <p>1 RYAN MEDRANO</p> <p>2 Exhibit 16 Series of e-mail from Ryan 230 11</p> <p>3 Medrano to Joe Ricci</p> <p>4</p> <p>5 Exhibit 17 E-mail from Joe Ricci to 232 19</p> <p>6 Ryan Medrano</p> <p>7</p> <p>8 Exhibit 18 E-mail from Ryan Medrano to 235 4</p> <p>9 Joe Ricci with attachment</p> <p>10</p> <p>11 Exhibit 19 E-mail from Ryan Medrano to 246 17</p> <p>12 Joe Ricci</p> <p>13</p> <p>14 Exhibit 20 Calendar invitation from 250 23</p> <p>15 Gary Rosen</p> <p>16</p> <p>17 Exhibit 21 e-mail from Joe Ricci to 254 14</p> <p>18 Ryan Medrano with attached</p> <p>19 invoice</p> <p>20</p> <p>21 Exhibit 22 E-mail with attachment 260 11</p> <p>22</p> <p>23 Exhibit 23 Subpoena responses 265 5</p> <p>24</p> <p>25 Exhibit 24 Amended subpoena responses 273 23</p>

<p style="text-align: right;">Page 26</p> <p>1 RYAN MEDRANO</p> <p>2 A Financial related accounting,</p> <p>3 bookkeeping, I like to say, and I worked</p> <p>4 with a guy named Joe Ricci, who is our</p> <p>5 accountant.</p> <p>6 Q Okay. How is Giuliani or how</p> <p>7 is Giuliani Partners organized?</p> <p>8 A In the early days there were</p> <p>9 several partners, but then they all started</p> <p>10 departing, I assume around 2010, 2012.</p> <p>11 And now, the last couple of</p> <p>12 years, while it was still open, Rudy was the</p> <p>13 only person that -- and you can talk to Joe</p> <p>14 about this, but he was the only person who</p> <p>15 had capital in the company.</p> <p>16 Because he kept on loaning</p> <p>17 the company money, and he actually has a</p> <p>18 company that is in debt to him actually</p> <p>19 several million dollars.</p> <p>20 Q Is Giuliani Partners an LLC?</p> <p>21 A Yes.</p> <p>22 Q Do you know who the members</p> <p>23 of the LLC are?</p> <p>24 A Technically they are still</p> <p>25 there, but they are all passive partners,</p>	<p style="text-align: right;">Page 28</p> <p>1 RYAN MEDRANO</p> <p>2 one this year.</p> <p>3 Q This year, meaning tax year</p> <p>4 2024?</p> <p>5 A '24, yes.</p> <p>6 Q Just with respect to Giuliani</p> <p>7 Partners, how many people are paid by</p> <p>8 Giuliani Partners?</p> <p>9 A None. It's closed,</p> <p>10 basically.</p> <p>11 Q When was the last time that</p> <p>12 Giuliani Partners paid any individuals or</p> <p>13 entities?</p> <p>14 A I'm not exact dates, but I</p> <p>15 would say '21, maybe; 2021.</p> <p>16 Q Okay. Do you recall who</p> <p>17 those individuals or entities were?</p> <p>18 A I don't. I would have to</p> <p>19 look in the records, but I am one of the few</p> <p>20 people that are on that.</p> <p>21 I'm trying to think what</p> <p>22 other companies. The security detail was</p> <p>23 Giuliani Security. They all left in '21,</p> <p>24 '22.</p> <p>25 Who else was around? I would</p>
<p style="text-align: right;">Page 27</p> <p>1 RYAN MEDRANO</p> <p>2 because they haven't participated in it, a</p> <p>3 lot of them, for over a decade, so it's</p> <p>4 really only Rudy right now.</p> <p>5 Q Do you know who the other</p> <p>6 members are?</p> <p>7 A Yeah, yes.</p> <p>8 Q And who are they?</p> <p>9 A Okay, hold on, let me make</p> <p>10 sure I get them all.</p> <p>11 I think this is it. There is</p> <p>12 Jeff Hess, Mike Hess, Eric Hatsamamos, Dan</p> <p>13 Connolly, Anthony Carbonetti, Steve Osterly</p> <p>14 -- Jeff Hess, Michael Hess, Eric Hatsamamos,</p> <p>15 Dan Connolly, Anthony Carbonetti, Stephen</p> <p>16 Osterly and Dennis Young, who passed away I</p> <p>17 think two or three years ago.</p> <p>18 But again, most of these guys</p> <p>19 left after the failed presidential bid and</p> <p>20 they have really not had much to do with the</p> <p>21 company, just having their name on it until</p> <p>22 it's dissolved, so.</p> <p>23 Q Does Giuliani Partners file</p> <p>24 regular tax returns?</p> <p>25 A Yes, this should be the final</p>	<p style="text-align: right;">Page 29</p> <p>1 RYAN MEDRANO</p> <p>2 have to look, I don't know.</p> <p>3 Q When you say the security</p> <p>4 detail, who are you referring to?</p> <p>5 A He had a security detail that</p> <p>6 he paid for once he left office, so they</p> <p>7 were a bunch of ex-police, ex-NYPD that took</p> <p>8 care of him, and they slowly started falling</p> <p>9 off as they couldn't afford them.</p> <p>10 Q Does Dr. Ryan receive any</p> <p>11 payment from Giuliani Partners?</p> <p>12 A I have to check, I don't</p> <p>13 remember when she came on. Currently, from</p> <p>14 Standard U.S.A., she gets a salary for being</p> <p>15 the CEO or operating manager of it.</p> <p>16 Q Okay. Does -- do you know</p> <p>17 who Monsignor Alan Placa is?</p> <p>18 A Yes, he's an old friend of</p> <p>19 Giuliani's.</p> <p>20 Q Does he receive any payment</p> <p>21 from Giuliani Partners?</p> <p>22 A No. He's owed money, but I</p> <p>23 highly doubt he will collect that.</p> <p>24 Q Why is he owed money?</p> <p>25 A Because he was working for</p>

<p style="text-align: right;">Page 30</p> <p>1 RYAN MEDRANO</p> <p>2 free for a year during COVID, I believe. I</p> <p>3 will have to look at the records.</p> <p>4 Q What was Monsignor Placa's</p> <p>5 role at Giuliani Partners?</p> <p>6 A He was more technology, IT.</p> <p>7 Q What do you mean by</p> <p>8 technology and IT?</p> <p>9 A He dealt with the computers,</p> <p>10 the phone system, computer system,</p> <p>11 technology.</p> <p>12 Q Okay. Did he have a title?</p> <p>13 A I don't recall.</p> <p>14 Q Is that the only role that he</p> <p>15 has had with Mr. Giuliani's companies?</p> <p>16 A The money -- I didn't really</p> <p>17 get involved with what each person did. At</p> <p>18 one point there were probably over 200</p> <p>19 people that worked there when Giuliani</p> <p>20 Capital Advisors, back in the day, 2005,</p> <p>21 2006.</p> <p>22 Q When you say Monsignor Placa</p> <p>23 worked for free, what were the circumstances</p> <p>24 of that arrangement?</p> <p>25 A I think we were supposed --</p>	<p style="text-align: right;">Page 32</p> <p>1 RYAN MEDRANO</p> <p>2 Giuliani Partners made any profit</p> <p>3 distributions?</p> <p>4 A I would have to look, I don't</p> <p>5 know. I mean, you are asking something</p> <p>6 that's really --</p> <p>7 Q If Giuliani Partners were to</p> <p>8 make a profit distribution, who would be</p> <p>9 entitled to --</p> <p>10 A Just Giuliani at this point,</p> <p>11 my understanding is it's Giuliani.</p> <p>12 Q What's that understanding</p> <p>13 based on?</p> <p>14 A He's the only one that has</p> <p>15 money invested in the firm, and he was</p> <p>16 basically paying to keep the payroll open</p> <p>17 for a couple of years in late 2010, 2015,</p> <p>18 '16.</p> <p>19 Q To the extent that you don't</p> <p>20 recall the details of the arrangements with</p> <p>21 Giuliani Partners, what types of -- what</p> <p>22 would you have to look at to refresh your</p> <p>23 recollection?</p> <p>24 A The tax returns.</p> <p>25 Q Are there any --</p>
<p style="text-align: right;">Page 31</p> <p>1 RYAN MEDRANO</p> <p>2 again, I'm not sure, but I think we were</p> <p>3 supposed to pay him a retainer, and he may</p> <p>4 have worked for a year, still helped us, but</p> <p>5 he's not going to get paid, because there is</p> <p>6 no money there.</p> <p>7 Q Was there a written agreement</p> <p>8 with Monsignor Placa?</p> <p>9 A I believe so in the record</p> <p>10 file from years ago. There has to be</p> <p>11 something in his file.</p> <p>12 Q I think you said that he</p> <p>13 wasn't going to collect the money he's owed.</p> <p>14 Why do you believe that?</p> <p>15 A Because the company is zero,</p> <p>16 it's broke. Who's going to pay him?</p> <p>17 Q Does Giuliani Partners ever</p> <p>18 make distributions of any profits?</p> <p>19 A They did back in the day, but</p> <p>20 it hasn't been profitable for a good six or</p> <p>21 seven years, so.</p> <p>22 Q How long ago is back in the</p> <p>23 day?</p> <p>24 A 2001 to 2010 or '11.</p> <p>25 Q Since around 1010 or '11 has</p>	<p style="text-align: right;">Page 33</p> <p>1 RYAN MEDRANO</p> <p>2 A Joe, Joe would have them.</p> <p>3 Q Do you possess any of the</p> <p>4 documents detailing the arrangements at</p> <p>5 Giuliani Partners?</p> <p>6 A Meaning? What do you mean?</p> <p>7 Q Do you possess any of</p> <p>8 Giuliani Partners' tax returns?</p> <p>9 A Yes, I have some of them, but</p> <p>10 Joe --</p> <p>11 Q Do you have a copy of its</p> <p>12 operating agreement or membership agreement?</p> <p>13 A From 2001. And then I</p> <p>14 believe after Roy Bailey left I have an</p> <p>15 amendment.</p> <p>16 Q Okay.</p> <p>17 Did you or do you have an</p> <p>18 e-mail at Giuliani Partners?</p> <p>19 A I do; but I don't really</p> <p>20 check it that often anymore, so --</p> <p>21 Q How many people -- do you</p> <p>22 know whether anybody else has a Giuliani</p> <p>23 Partners e-mail?</p> <p>24 A Probably five or six, I don't</p> <p>25 know, I have to call the tech people and ask</p>

<p style="text-align: right;">Page 34</p> <p>1 RYAN MEDRANO</p> <p>2 them who's still on that thing.</p> <p>3 Q If Giuliani Partners is not</p> <p>4 active, why does it still have active e-mail</p> <p>5 addresses?</p> <p>6 A Just not focusing on it, and</p> <p>7 this year we decided let's just close</p> <p>8 everything, it's time.</p> <p>9 I have asked to close to a</p> <p>10 couple of years ago, but it's just something</p> <p>11 that you have to get to, and it costs money</p> <p>12 to do, and a lot of things, but it's -- to</p> <p>13 get them, to convince them to close them.</p> <p>14 Q When you say we decided let's</p> <p>15 just close everything, it's time, who do you</p> <p>16 mean by we?</p> <p>17 A I talked to Rudy about that</p> <p>18 at the beginning of the year.</p> <p>19 Q At the beginning of what</p> <p>20 year?</p> <p>21 A 2024.</p> <p>22 And Joe Ricci, our</p> <p>23 accountant.</p> <p>24 Q Have you taken any steps to</p> <p>25 close Giuliani Partners?</p>	<p style="text-align: right;">Page 36</p> <p>1 RYAN MEDRANO</p> <p>2 don't know how it's done. I don't know --</p> <p>3 I'm not a lawyer, or --</p> <p>4 Q Okay, I would like to ask</p> <p>5 about Giuliani Group that you mentioned.</p> <p>6 What is Giuliani Group?</p> <p>7 A It was a pass-through entity,</p> <p>8 one of the -- from what I can recall, it was</p> <p>9 one of the -- it was created because Ernst &</p> <p>10 Young was a partner when the firm started.</p> <p>11 And to avoid conflict of</p> <p>12 interest, because they audited a lot of</p> <p>13 companies, they created Giuliani Group.</p> <p>14 So it existed for a year or</p> <p>15 two, and then after that it's been dormant,</p> <p>16 it's a pass-through.</p> <p>17 Q You say Ernst & Young was a</p> <p>18 partner when the firm started. Which firm</p> <p>19 are you referring to?</p> <p>20 A All of them, I think Giuliani</p> <p>21 & Company, though, which is the umbrella</p> <p>22 company of all of them.</p> <p>23 Q Okay.</p> <p>24 A Or maybe -- no, I'm sorry. I</p> <p>25 think they were a partner of -- I don't</p>
<p style="text-align: right;">Page 35</p> <p>1 RYAN MEDRANO</p> <p>2 A Yes, well, Joe has been doing</p> <p>3 it, for sure.</p> <p>4 Q Okay. When you say it costs</p> <p>5 money, where is that money going to come</p> <p>6 from?</p> <p>7 A I don't know. We have been</p> <p>8 trying to use people we know, but I don't</p> <p>9 know the details.</p> <p>10 I would ask Joe Ricci what it</p> <p>11 cost, because he's the one who says it's</p> <p>12 going to cost a lot of money to do it, but I</p> <p>13 haven't been handed a bill.</p> <p>14 Q When you say we have been</p> <p>15 trying to use people we know, what do you</p> <p>16 mean by that?</p> <p>17 A Really like Joe, he's been</p> <p>18 helping, the accountant. I don't know if</p> <p>19 he's reaching out to any lawyers, friends of</p> <p>20 his, I have no idea, but in essence it's</p> <p>21 closing the accounts out.</p> <p>22 Q So when you say it's going to</p> <p>23 cost money to close Giuliani Partners, what</p> <p>24 costs exactly are you referring to?</p> <p>25 A I think legal fees. I just</p>	<p style="text-align: right;">Page 37</p> <p>1 RYAN MEDRANO</p> <p>2 know. I would have to look at the records</p> <p>3 again.</p> <p>4 Q So, what's your -- is</p> <p>5 Giuliani Group also an LLC?</p> <p>6 A Yes, I believe they are all</p> <p>7 LLCs, except for World Capital, which is an</p> <p>8 S Corp.</p> <p>9 Q And what's your understanding</p> <p>10 of what a pass-through entity is?</p> <p>11 A Pass-through entity on the</p> <p>12 tax return doesn't file one, and the money</p> <p>13 goes up to the Giuliani Company, which is</p> <p>14 the ultimate -- I don't know what you call</p> <p>15 it, top, the top company, holding company, I</p> <p>16 guess.</p> <p>17 I don't really know what the</p> <p>18 technical term is.</p> <p>19 Q Okay.</p> <p>20 Maybe I should just get a</p> <p>21 full picture of the map of these companies,</p> <p>22 so that I can know which to ask for in which</p> <p>23 order, which to ask about in which order.</p> <p>24 You mentioned that Giuliani &</p> <p>25 Company is the umbrella company?</p>

10 (Pages 34 - 37)

<p style="text-align: right;">Page 66</p> <p>1 RYAN MEDRANO</p> <p>2 worked for him.</p> <p>3 Q Is there any reason he</p> <p>4 wouldn't have been able to pay the people</p> <p>5 who worked for him directly?</p> <p>6 A I don't believe he could --</p> <p>7 well, I would have to talk to the</p> <p>8 accountants on that one, but they are the</p> <p>9 ones who decided this is the proper way to</p> <p>10 go.</p> <p>11 Q Are you an accountant?</p> <p>12 A No, I am not.</p> <p>13 Q Okay, I think you've called</p> <p>14 yourself the money man a few times.</p> <p>15 A It's finance related, so</p> <p>16 that's why I was talking about, and</p> <p>17 accounting. I never said that I was an</p> <p>18 accountant.</p> <p>19 Q No, no, what is your</p> <p>20 professional training?</p> <p>21 A I just started working on</p> <p>22 campaigns, for the finance departments,</p> <p>23 budgeting director, the accounting.</p> <p>24 And then Giuliani was looking</p> <p>25 for a controller and they interviewed me and</p>	<p style="text-align: right;">Page 68</p> <p>1 RYAN MEDRANO</p> <p>2 Q And did you ever have any</p> <p>3 conversations with Mr. Giuliani about that</p> <p>4 topic?</p> <p>5 A No.</p> <p>6 Q Does Giuliani Communications</p> <p>7 ever distribute any profits?</p> <p>8 A I think we paid some of his</p> <p>9 taxes last year, but that was it. He didn't</p> <p>10 collect any money early for the first year,</p> <p>11 I believe.</p> <p>12 And then I believe this year</p> <p>13 we might have paid him.</p> <p>14 Q And when you say, "we might</p> <p>15 have paid him," what do you mean?</p> <p>16 A Meaning I'm pretty sure we</p> <p>17 sent wires to him, I would have to look at</p> <p>18 the records.</p> <p>19 Q And those wires, to the</p> <p>20 extent that you sent -- let me be precise.</p> <p>21 When you say "we went wires," you mean</p> <p>22 Giuliani Communications?</p> <p>23 A The entity, Giuliani</p> <p>24 Communications.</p> <p>25 Q Sent wires to Mr. Giuliani?</p>
<p style="text-align: right;">Page 67</p> <p>1 RYAN MEDRANO</p> <p>2 he liked me, and I've been there off and on</p> <p>3 for the past 27 years.</p> <p>4 Q And do you have any</p> <p>5 professional degrees?</p> <p>6 A Not in accounting. Yeah, I</p> <p>7 do, in psychology.</p> <p>8 Q And do you have any</p> <p>9 professional licenses?</p> <p>10 A No.</p> <p>11 Q Sorry, I just thought I would</p> <p>12 ask.</p> <p>13 So, are you aware of any</p> <p>14 reason why Mr. Giuliani couldn't have been</p> <p>15 paid directly for his services?</p> <p>16 A Again, the accountants set it</p> <p>17 up this way because he had to pay other</p> <p>18 people who are working for him, because some</p> <p>19 people are with him a lot.</p> <p>20 Q Did you ever have any</p> <p>21 conversations with the accountants about</p> <p>22 that topic?</p> <p>23 A Not really. They would set</p> <p>24 it up, so I said okay, this is the entity,</p> <p>25 then. That's where we went with it.</p>	<p style="text-align: right;">Page 69</p> <p>1 RYAN MEDRANO</p> <p>2 A Correct.</p> <p>3 Q And you would have been the</p> <p>4 person responsible for executing those</p> <p>5 wires?</p> <p>6 A Yes.</p> <p>7 Q And to the extent you sent</p> <p>8 wires to Mr. Giuliani, those would have</p> <p>9 represented profit distributions to</p> <p>10 Mr. Giuliani?</p> <p>11 A Well, I was told it was --</p> <p>12 yeah, I guess so. Because he used it to pay</p> <p>13 taxes that he owed on his property.</p> <p>14 Q Okay.</p> <p>15 So Mr. Giuliani -- excuse me,</p> <p>16 Mr. Giuliani's relationship with Giuliani</p> <p>17 Communications was that of an owner, is that</p> <p>18 accurate?</p> <p>19 A Yes.</p> <p>20 Q So, he, in that capacity, did</p> <p>21 he have an entitlement to all of the profits</p> <p>22 of Giuliani Communications?</p> <p>23 A Well, that's the thing. It's</p> <p>24 an LLC, and I'm assuming it's a single</p> <p>25 member, because I believe he's the only one,</p>

<p style="text-align: right;">Page 70</p> <p>1 RYAN MEDRANO</p> <p>2 and an LLC could have various partners in</p> <p>3 it, so --</p> <p>4 Q Okay. Is it your</p> <p>5 understanding that Mr. Giuliani is the sole</p> <p>6 member of Giuliani Communications?</p> <p>7 A Yes. I don't believe anyone</p> <p>8 has been added to the organization as an</p> <p>9 owner, so yes.</p> <p>10 Q So, if Giuliani</p> <p>11 Communications had profits, would anybody</p> <p>12 other than Mr. Giuliani be entitled to those</p> <p>13 profits?</p> <p>14 A No. I'm pretty sure it's the</p> <p>15 same.</p> <p>16 Q And how does Giuliani</p> <p>17 Communications decide when to distribute</p> <p>18 profits to its owner?</p> <p>19 A I believe it's when he had</p> <p>20 his -- he didn't take any money the first</p> <p>21 year, that's for sure.</p> <p>22 And then I think the second</p> <p>23 year, it's around each quarterly tax return.</p> <p>24 Q Okay. And is there --</p> <p>25 A I would have to look, I would</p>	<p style="text-align: right;">Page 72</p> <p>1 RYAN MEDRANO</p> <p>2 have to look.</p> <p>3 Q When you say taxes, you are</p> <p>4 referring to Mr. Giuliani's personal taxes,</p> <p>5 is that accurate?</p> <p>6 A Yes, I believe property taxes</p> <p>7 and whatever other taxes he owes. I don't</p> <p>8 really ask the question.</p> <p>9 Q Does Giuliani Communications</p> <p>10 have an operating agreement?</p> <p>11 A Yes, I would have to track</p> <p>12 one down, but I'm sure there is one.</p> <p>13 Q Do you have a copy of that</p> <p>14 operating agreement?</p> <p>15 A I would have to look.</p> <p>16 Q How do you know that Giuliani</p> <p>17 Communications was making distributions to</p> <p>18 Mr. Giuliani for the purpose of</p> <p>19 Mr. Giuliani's taxes?</p> <p>20 A That's the way Maria would</p> <p>21 tell me, that's what he's using it for.</p> <p>22 Q As far as you know, could it</p> <p>23 have been for any other expenses of</p> <p>24 Mr. Giuliani's?</p> <p>25 A I don't know.</p>
<p style="text-align: right;">Page 71</p> <p>1 RYAN MEDRANO</p> <p>2 have to look.</p> <p>3 Q So is it fair to say that</p> <p>4 it's up to Mr. Giuliani when to take profit</p> <p>5 distributions from Giuliani Communications?</p> <p>6 A I don't know if it's -- I</p> <p>7 assume so, but he talks to Maria as well,</p> <p>8 I'm sure. I don't know the process.</p> <p>9 Q Does Maria have any legal</p> <p>10 authority to decide when profit</p> <p>11 distributions are made from Giuliani</p> <p>12 Communications?</p> <p>13 A I'm not sure about legal</p> <p>14 authority, but since he's running the show,</p> <p>15 I would get a text where she said please, or</p> <p>16 a call, please distribute money to him,</p> <p>17 because he needs to pay his taxes.</p> <p>18 Q Okay. So the distribution,</p> <p>19 it sounds like what you're saying in your</p> <p>20 experience, distributions of profits to</p> <p>21 Mr. Giuliani would respond to Mr. Giuliani's</p> <p>22 needs as they arose, is that fair to say?</p> <p>23 A I believe so.</p> <p>24 His taxes I think 100 percent</p> <p>25 of the time, but I could be wrong, I would</p>	<p style="text-align: right;">Page 73</p> <p>1 RYAN MEDRANO</p> <p>2 Q If Dr. Ryan asked you to make</p> <p>3 a distribution of profits for -- to</p> <p>4 Mr. Giuliani from Giuliani Communications,</p> <p>5 is there any reason you can think of why you</p> <p>6 would refuse a request like that?</p> <p>7 A Not that I know of. I'm</p> <p>8 trying to think the timeline there, because</p> <p>9 at one point, whoever his lawyer was at the</p> <p>10 time said you can't -- I don't remember</p> <p>11 whether it was -- maybe -- just to contact</p> <p>12 me or the accountant if he could make a</p> <p>13 distribution.</p> <p>14 I don't remember the</p> <p>15 conversation.</p> <p>16 Q In your experience --</p> <p>17 MR. NATHAN: Or strike that.</p> <p>18 Q -- was there ever an occasion</p> <p>19 when you did refuse a request to make a</p> <p>20 distribution of profits from Giuliani</p> <p>21 Communications?</p> <p>22 A No.</p> <p>23 Q Just returning, a moment ago</p> <p>24 you testified that Dr. Ryan would tell you</p> <p>25 that Mr. Giuliani would use the distribution</p>

19 (Pages 70 - 73)

<p style="text-align: right;">Page 74</p> <p>1 RYAN MEDRANO</p> <p>2 to pay his personal taxes.</p> <p>3 Do you have any other reason</p> <p>4 for thinking that to be the -- for thinking</p> <p>5 that to be true?</p> <p>6 A No, I didn't really question</p> <p>7 it. I mean, that's what he decided.</p> <p>8 Q You don't know one way or the</p> <p>9 other what Mr. Giuliani did with the profits</p> <p>10 once they were distributed to him?</p> <p>11 A Correct, that's not my thing</p> <p>12 to do in the company.</p> <p>13 Q And it wouldn't have mattered</p> <p>14 to you one way or the other what the reason</p> <p>15 was, provided the request came from</p> <p>16 Mr. Giuliani or from Dr. Ryan, is that</p> <p>17 right?</p> <p>18 A Correct.</p> <p>19 Q And just to make sure I'm</p> <p>20 clear, it's fair to say that profit</p> <p>21 distributions from Giuliani Communications</p> <p>22 are done on an ad hoc basis?</p> <p>23 A I believe they were done</p> <p>24 quarterly -- not -- I think it was when the</p> <p>25 tax returns were due, so that's why he</p>	<p style="text-align: right;">Page 76</p> <p>1 RYAN MEDRANO</p> <p>2 A The current company, yes.</p> <p>3 Q What's the current company?</p> <p>4 A Standard U.S.A., LLC.</p> <p>5 Q And what is Standard U.S.A.,</p> <p>6 LLC?</p> <p>7 A It's an entity that is</p> <p>8 similar to Communications, I believe it's</p> <p>9 domiciled in Florida, just like</p> <p>10 Communications.</p> <p>11 I was told this is the</p> <p>12 entity, and that's where it started in late</p> <p>13 August, 2024, September, maybe. I don't</p> <p>14 know exactly about that.</p> <p>15 Q This may be a natural time</p> <p>16 for a break. If that's all right with you,</p> <p>17 Mr. Medrano, we can go off the record for a</p> <p>18 few minutes, let you have a break, give the</p> <p>19 court reporter a break.</p> <p>20 Is that all right with you?</p> <p>21 A I want Steve on it, because</p> <p>22 he wants to get out of here, man. Five</p> <p>23 minutes.</p> <p>24 Q Why don't we come back at</p> <p>25 10:30.</p>
<p style="text-align: right;">Page 75</p> <p>1 RYAN MEDRANO</p> <p>2 requested them.</p> <p>3 Q But the reason for the</p> <p>4 timing, as far as you are aware, was</p> <p>5 Mr. Giuliani's own need to pay taxes, rather</p> <p>6 than some internal rule that applied to</p> <p>7 Giuliani Communications?</p> <p>8 A Correct. That was --</p> <p>9 Q And if Mr. Giuliani's own</p> <p>10 personal financial needs had been slightly</p> <p>11 different, then the profit distributions</p> <p>12 could have been changed to match those needs</p> <p>13 instead?</p> <p>14 A I'm sorry, one more time?</p> <p>15 Q If Mr. Giuliani -- if the</p> <p>16 timing of Mr. Giuliani's financial needs had</p> <p>17 been different, the distributions of profits</p> <p>18 from Giuliani Communications could also have</p> <p>19 been changed to meet that timing?</p> <p>20 A Yes, if they decided.</p> <p>21 Q I would just like to ask now</p> <p>22 about -- well, I think you mentioned another</p> <p>23 LLC.</p> <p>24 Are there any other LLCs in</p> <p>25 which Mr. Giuliani has an interest?</p>	<p style="text-align: right;">Page 77</p> <p>1 RYAN MEDRANO</p> <p>2 A Okay, perfect.</p> <p>3 THE VIDEOGRAPHER: Going off</p> <p>4 the record, the time is 10:20 a.m.,</p> <p>5 this is the end of media unit 1.</p> <p>6 (At this point in the proceedings</p> <p>7 there was a recess, after which the</p> <p>8 deposition continued as follows:)</p> <p>9 THE VIDEOGRAPHER: We are</p> <p>10 back on the record, the time is</p> <p>11 10:31 a.m. This is the beginning of</p> <p>12 media unit 2.</p> <p>13 Q Mr. Medrano, during the break</p> <p>14 did you discuss your deposition testimony</p> <p>15 with anyone?</p> <p>16 A No.</p> <p>17 Q You mentioned earlier that</p> <p>18 you had some difficulty opening bank</p> <p>19 accounts with Mr. Giuliani's name on them.</p> <p>20 Other than the Parkside</p> <p>21 account you were discussing, did you open</p> <p>22 any other accounts with Mr. Giuliani on the</p> <p>23 account?</p> <p>24 A I did not open it. Maria</p> <p>25 opened the bank account in Florida for</p>

20 (Pages 74 - 77)

<p style="text-align: right;">Page 78</p> <p>1 RYAN MEDRANO</p> <p>2 Standard U.S.A., LLC.</p> <p>3 Q Have you opened any bank</p> <p>4 accounts in Maria Ryan's name?</p> <p>5 A No.</p> <p>6 Q Have you opened any bank</p> <p>7 accounts in Ted Goodman's name?</p> <p>8 A No.</p> <p>9 Q Have you opened any other</p> <p>10 bank accounts in Giuliani Communications'</p> <p>11 name?</p> <p>12 A No.</p> <p>13 Q And other than the bank</p> <p>14 account that you just mentioned in Florida,</p> <p>15 are you aware of any other bank accounts for</p> <p>16 Standard U.S.A., LLC?</p> <p>17 A No.</p> <p>18 Q Okay. Let's talk about</p> <p>19 Standard U.S.A., LLC.</p> <p>20 Was that --</p> <p>21 A It's what he does his media</p> <p>22 things through. It handles his business</p> <p>23 dealings, his media.</p> <p>24 Q It's an LLC, you say, is that</p> <p>25 right?</p>	<p style="text-align: right;">Page 80</p> <p>1 RYAN MEDRANO</p> <p>2 Q Does Standard U.S.A., LLC</p> <p>3 have any activities other than being the</p> <p>4 entity through which Mr. Giuliani does his</p> <p>5 business?</p> <p>6 A No.</p> <p>7 Q What is the nature of the</p> <p>8 business that Mr. Giuliani conducts through</p> <p>9 Standard U.S.A., LLC?</p> <p>10 A His radio show, and anything</p> <p>11 he promotes. I believe that coffee was the</p> <p>12 most recent one that was in the press.</p> <p>13 So it's an entity that</p> <p>14 captures whatever he's pushing or selling or</p> <p>15 what advertising space he sells on his radio</p> <p>16 show.</p> <p>17 Q When you say his radio show,</p> <p>18 what do you mean?</p> <p>19 A I don't know, because I</p> <p>20 haven't listened to it in a while, but I</p> <p>21 think he's on daily still, I just -- I'm not</p> <p>22 involved in the day-to-day, sorry.</p> <p>23 Q And you mentioned something</p> <p>24 about coffee. What did you mean by that?</p> <p>25 A There is, one of his new</p>
<p style="text-align: right;">Page 79</p> <p>1 RYAN MEDRANO</p> <p>2 A Yes.</p> <p>3 Q And do you know how many</p> <p>4 members it has?</p> <p>5 A I believe three, but I don't</p> <p>6 know the percentages.</p> <p>7 Q And who are those three?</p> <p>8 A Mayor Giuliani, Maria Ryan</p> <p>9 and Ted Goodman.</p> <p>10 Q Okay.</p> <p>11 And you don't know the</p> <p>12 percentages. Do you know the relative</p> <p>13 shares?</p> <p>14 A He is definitely around 80</p> <p>15 and either it's 20 or 10 the other two</p> <p>16 split, I just don't know.</p> <p>17 Q As far as you know,</p> <p>18 Mr. Giuliani is the majority owner of the</p> <p>19 LLC?</p> <p>20 A I believe so.</p> <p>21 Q Do you know why Maria Ryan</p> <p>22 and Ted Goodman were given ownership shares</p> <p>23 of Standard U.S.A., LLC?</p> <p>24 A I'm not privy to that, I</p> <p>25 don't know.</p>	<p style="text-align: right;">Page 81</p> <p>1 RYAN MEDRANO</p> <p>2 sponsors that was in the paper a couple of</p> <p>3 months ago, it's a coffee brand he</p> <p>4 advertises.</p> <p>5 Q How did you learn about that?</p> <p>6 A I believe I have a contract</p> <p>7 from them.</p> <p>8 Q Who provided you with that</p> <p>9 contract?</p> <p>10 A Maria, I believe.</p> <p>11 Q Did you negotiate the</p> <p>12 contract?</p> <p>13 A No.</p> <p>14 Q So you learned about it from</p> <p>15 Maria?</p> <p>16 A Yes.</p> <p>17 Q Do you know who negotiated</p> <p>18 the contract?</p> <p>19 A I'm assuming Maria.</p> <p>20 Q Was that contract with</p> <p>21 Standard U.S.A., LLC?</p> <p>22 A Yes.</p> <p>23 Q Are you aware of any other</p> <p>24 contracts that Standard U.S.A., LLC has</p> <p>25 executed?</p>

21 (Pages 78 - 81)

<p style="text-align: right;">Page 82</p> <p>1 RYAN MEDRANO</p> <p>2 A Yes, he has several. He has</p> <p>3 the Newsmag, and then he has Red Eagle, and</p> <p>4 what else is on there?</p> <p>5 I would have to look, but</p> <p>6 those are the big ones that he receives.</p> <p>7 Q How long has Standard U.S.A.,</p> <p>8 LLC been in existence?</p> <p>9 A I believe around September</p> <p>10 1st of this year.</p> <p>11 Q Do you know why it was set up</p> <p>12 on that date?</p> <p>13 A No, not really.</p> <p>14 Q The contracts you mentioned,</p> <p>15 are they in addition to the contracts that</p> <p>16 Giuliani Communications LLC had?</p> <p>17 A They have new contracts, so I</p> <p>18 think that's the only other one, I'm trying</p> <p>19 to remember.</p> <p>20 I would just have to look at</p> <p>21 the records, at the bank statements.</p> <p>22 Q Okay. How do you receive --</p> <p>23 MR. NATHAN: Strike that.</p> <p>24 Q Generally speaking, how could</p> <p>25 you learn about the business activities of</p>	<p style="text-align: right;">Page 84</p> <p>1 RYAN MEDRANO</p> <p>2 Do you know -- do you know</p> <p>3 how Standard U.S.A. earns revenues?</p> <p>4 A It's through those contracts</p> <p>5 I just mentioned, that's where the revenue</p> <p>6 comes in.</p> <p>7 Q Okay. And how much revenue</p> <p>8 comes in?</p> <p>9 A It just depends on how many</p> <p>10 advertising spots he does.</p> <p>11 Q Okay. Are you aware since</p> <p>12 September 1, 2024 how much revenue Standard</p> <p>13 has earned?</p> <p>14 A I would have to look it up.</p> <p>15 Q But do you have documents</p> <p>16 that would show how much revenue?</p> <p>17 A Yeah, the bank statements,</p> <p>18 yeah, yeah, for sure.</p> <p>19 Q And you have access to all of</p> <p>20 Standard's bank statements?</p> <p>21 A Yes.</p> <p>22 Q I think you mentioned setting</p> <p>23 up a bank account for Standard in Florida,</p> <p>24 could you tell me everything you know about</p> <p>25 that bank account?</p>
<p style="text-align: right;">Page 83</p> <p>1 RYAN MEDRANO</p> <p>2 Standard U.S.A., LLC?</p> <p>3 A Through Maria.</p> <p>4 Q What's your understanding of</p> <p>5 Maria's role in that company?</p> <p>6 A The manager. She's running</p> <p>7 it, she negotiates the contracts.</p> <p>8 Q What's your understanding of</p> <p>9 Ted Goodman's role in the company?</p> <p>10 A He is a consultant that he</p> <p>11 hired him for media, and then just anything</p> <p>12 Giuliani needs, Ted will help him.</p> <p>13 He is an old guy, so he's in</p> <p>14 his '80s, so he needs people.</p> <p>15 Q And what's your understanding</p> <p>16 of Mr. Giuliani's role in the company?</p> <p>17 A He again is like, if I was</p> <p>18 writing a policy on it, he would be the key</p> <p>19 man.</p> <p>20 Q You mentioned a contract with</p> <p>21 something having to do with coffee. Do you</p> <p>22 recall who the counterparty is for that</p> <p>23 contract?</p> <p>24 A Yeah, it's Burke Coffee.</p> <p>25 Q Burke, okay.</p>	<p style="text-align: right;">Page 85</p> <p>1 RYAN MEDRANO</p> <p>2 A It's the only account.</p> <p>3 Q Okay. And could you tell me</p> <p>4 what you know about it?</p> <p>5 A It's a regular business</p> <p>6 checking account.</p> <p>7 Q And what bank is it at?</p> <p>8 A I think FINANCIAL. I</p> <p>9 didn't --</p> <p>10 Q I'm sorry, you understand why</p> <p>11 I was confused. You are not saying you</p> <p>12 think the name of the bank --</p> <p>13 A I've got you. Sorry, I</p> <p>14 didn't do that -- iThink Financial Credit</p> <p>15 Union. It's somewhere in South Florida.</p> <p>16 Q So the name of the bank is</p> <p>17 iThink?</p> <p>18 A Yes.</p> <p>19 Q Is that one word, iThink?</p> <p>20 A IThink, yes, is all one</p> <p>21 word. I've been to their concert venues,</p> <p>22 Financial Credit Union.</p> <p>23 Q That's helpful, thank you.</p> <p>24 And Standard has one bank</p> <p>25 account at iThink Financial?</p>

<p style="text-align: right;">Page 86</p> <p>1 RYAN MEDRANO</p> <p>2 A Just one.</p> <p>3 Q And no other bank accounts,</p> <p>4 is that accurate?</p> <p>5 A Yes, no.</p> <p>6 Q And are you a --</p> <p>7 A Sorry, Steve, you told me not</p> <p>8 to talk while he's talking, and I'm trying.</p> <p>9 Sorry, Mr. Nathan, what did you say?</p> <p>10 Q Standard has one bank account</p> <p>11 at iThink Financial, and no other bank</p> <p>12 accounts?</p> <p>13 A Correct.</p> <p>14 Q Thank you.</p> <p>15 And are you a signer on that</p> <p>16 account?</p> <p>17 A Yes, sir.</p> <p>18 Q Are there any other signers</p> <p>19 on the account?</p> <p>20 A Maria is on this one.</p> <p>21 Q Okay. Is Mr. Giuliani a</p> <p>22 signer on the account?</p> <p>23 A I don't believe so.</p> <p>24 Q And why not?</p> <p>25 A I don't know. They opened</p>	<p style="text-align: right;">Page 88</p> <p>1 RYAN MEDRANO</p> <p>2 A The same names as</p> <p>3 Communications.</p> <p>4 Q And who are they?</p> <p>5 A Mayor Giuliani, Maria Ryan,</p> <p>6 Ted Goodman, Michael Ragusa, myself and Joe</p> <p>7 Ricci.</p> <p>8 Q Are those people W-2</p> <p>9 employees of Standard U.S.A.?</p> <p>10 A Maria Ryan is the W-2.</p> <p>11 Q Maria Ryan is also a part</p> <p>12 owner of Standard U.S.A., is that correct?</p> <p>13 A Yes, I believe so, but I</p> <p>14 remember going about, talking to them about</p> <p>15 this, and somehow the accountant cleared it.</p> <p>16 Q So, I'm sorry, you just</p> <p>17 testified you remember talking to Maria Ryan</p> <p>18 and Mr. Giuliani about this, is that</p> <p>19 accurate?</p> <p>20 A No, I was talking to Joe</p> <p>21 Ricci about it, because one of the rules is</p> <p>22 you can't be a 1099 and a W-2 at the same</p> <p>23 time.</p> <p>24 I believe you can, if you</p> <p>25 start as one you can do the other, as long</p>
<p style="text-align: right;">Page 87</p> <p>1 RYAN MEDRANO</p> <p>2 that without -- I had nothing to do with</p> <p>3 that. I was told one day this is the</p> <p>4 account.</p> <p>5 Q As a signer, did you have any</p> <p>6 role in opening the account?</p> <p>7 A Just what they needed, my --</p> <p>8 iThink, they needed a passport, and maybe a</p> <p>9 credit card or something to show I'm a</p> <p>10 legitimate person.</p> <p>11 Q Okay.</p> <p>12 Have you ever executed any</p> <p>13 financial transactions on behalf of Standard</p> <p>14 U.S.A.?</p> <p>15 A Yes.</p> <p>16 Q Could you tell me about</p> <p>17 those?</p> <p>18 A Your basic expenses, again,</p> <p>19 the people that work for them, and any type</p> <p>20 of equipment they use for their show and any</p> <p>21 technology they may use.</p> <p>22 Q I'm sorry, go ahead.</p> <p>23 A Just business expenses.</p> <p>24 Q And who works for Standard</p> <p>25 U.S.A.?</p>	<p style="text-align: right;">Page 89</p> <p>1 RYAN MEDRANO</p> <p>2 as there is a definite cut-off.</p> <p>3 But I don't know how they</p> <p>4 resolved it, but they said legally they are</p> <p>5 okay.</p> <p>6 Q Okay, but it was a conscious</p> <p>7 decision to make Maria Ryan both an owner</p> <p>8 and a W-2 employee, is that right?</p> <p>9 A I wasn't in on those</p> <p>10 conversations when they formed the thing.</p> <p>11 Q I'm sorry, is Maria Ryan a</p> <p>12 1099 employee of Standard U.S.A.?</p> <p>13 A No, she's being paid via a</p> <p>14 W-2 currently.</p> <p>15 I would have to speak to Joe</p> <p>16 Ricci on it to figure out how it was</p> <p>17 resolved.</p> <p>18 Q Joe Ricci would know the</p> <p>19 answer to that question?</p> <p>20 A Yes, I believe so.</p> <p>21 Q And generally speaking, Joe</p> <p>22 Ricci would know the answer to questions</p> <p>23 regarding the finances of Mr. Giuliani's</p> <p>24 companies that you might not know?</p> <p>25 A Yeah, he should; but he's --</p>

23 (Pages 86 - 89)

<p style="text-align: right;">Page 98</p> <p>1 RYAN MEDRANO</p> <p>2 does his taxes, so that's the only thing</p> <p>3 that would have came up in the early part of</p> <p>4 2024.</p> <p>5 Q How would it have been</p> <p>6 relevant to Mr. Giuliani's taxes?</p> <p>7 A Well, if he's got to claim it</p> <p>8 as his residence, his tax place has changed,</p> <p>9 so I don't know what he did. Eventually Joe</p> <p>10 is the one who knows.</p> <p>11 Q And the first conversations</p> <p>12 you had about -- when would you have</p> <p>13 spoke --</p> <p>14 MR. NATHAN: Strike that, I'm</p> <p>15 sorry.</p> <p>16 Q I think you just testified</p> <p>17 that you might have spoken to Joe about it</p> <p>18 in the early part of 2024.</p> <p>19 Is that the earliest you</p> <p>20 would have spoken to Joe Ricci about Mr.</p> <p>21 Giuliani's tax situation arising from</p> <p>22 spending more time in Florida?</p> <p>23 A Well, I think so, because the</p> <p>24 only thing I would say is you have to do</p> <p>25 like change of residence and all that stuff,</p>	<p style="text-align: right;">Page 100</p> <p>1 RYAN MEDRANO</p> <p>2 be on your radar.</p> <p>3 Q I would like to just go back</p> <p>4 to Standard U.S.A.</p> <p>5 I think I asked whether you</p> <p>6 knew anything about Standard U.S.A.'s</p> <p>7 revenues.</p> <p>8 Could you give me a sense of</p> <p>9 how much money Standard U.S.A. takes in?</p> <p>10 A It varies upon his -- the ads</p> <p>11 that he's selling.</p> <p>12 So anywhere from \$20 to \$40,</p> <p>13 I believe, but I would have to look.</p> <p>14 Q 20 to 40 what?</p> <p>15 A \$20 to \$40,000 a month, but I</p> <p>16 would have to look at the bank statements.</p> <p>17 Q So Standard has been in</p> <p>18 existence since September 2024, is that</p> <p>19 right?</p> <p>20 A Yes, I don't know the exact</p> <p>21 date, but it's around there.</p> <p>22 Q So that's four months, do you</p> <p>23 agree?</p> <p>24 A Yes.</p> <p>25 Q Do you have records of how</p>
<p style="text-align: right;">Page 99</p> <p>1 RYAN MEDRANO</p> <p>2 so I don't know what happened afterwards.</p> <p>3 I think he was actually on</p> <p>4 the phone call we were talking about closing</p> <p>5 the entities.</p> <p>6 Q That phone call, when did</p> <p>7 that occur?</p> <p>8 A At the beginning of the 2024,</p> <p>9 in the first quarter, at least.</p> <p>10 Q Okay. And when you say you</p> <p>11 have to do like change of residence, what do</p> <p>12 you mean by that?</p> <p>13 A You just don't -- you have to</p> <p>14 file residency. That's why, I don't know if</p> <p>15 he changed any of his licenses or residency.</p> <p>16 When I came to Missouri, I</p> <p>17 had to tell them, from New York.</p> <p>18 Q But you don't have any</p> <p>19 personal knowledge of any changes of that</p> <p>20 kind that Mr. Giuliani may have made?</p> <p>21 A No.</p> <p>22 Q And you didn't follow up with</p> <p>23 Joe Ricci about any of that?</p> <p>24 A No. I mentioned to him, just</p> <p>25 to say, hey, this is something that should</p>	<p style="text-align: right;">Page 101</p> <p>1 RYAN MEDRANO</p> <p>2 much Standard has taken in in each of those</p> <p>3 four months?</p> <p>4 A Yes, it's all on the bank</p> <p>5 statement.</p> <p>6 Q Okay. And do you have</p> <p>7 records of Standard's expenses during those</p> <p>8 four months?</p> <p>9 A Yes. There isn't much, it's</p> <p>10 just salaries, employees, and whatever</p> <p>11 expenses they have to run the business.</p> <p>12 Q And does Standard have any</p> <p>13 profits during those four months?</p> <p>14 A A little, not much.</p> <p>15 Q Has Standard distributed --</p> <p>16 sorry, when you say, "a little, not much,"</p> <p>17 could you give me a ballpark?</p> <p>18 A Probably \$10,000 a month,</p> <p>19 say, net.</p> <p>20 Q And has Standard</p> <p>21 distributed -- excuse me, has Standard</p> <p>22 distributed any of those profits during its</p> <p>23 existence?</p> <p>24 A I don't think so, but I have</p> <p>25 to look.</p>

<p style="text-align: right;">Page 102</p> <p>1 RYAN MEDRANO</p> <p>2 Q But you would have a record</p> <p>3 of any profit distributions that Standard</p> <p>4 has made?</p> <p>5 A Yes.</p> <p>6 Q And who would those profit</p> <p>7 distributions have been to?</p> <p>8 A Rudy, if I sent one to him, I</p> <p>9 would just have to look, Giuliani.</p> <p>10 Q Would you have sent any</p> <p>11 profit distributions to Maria or Ted?</p> <p>12 A No. Ted is on a retainer,</p> <p>13 and he may get something, I guess, at the</p> <p>14 end of the year as a bonus.</p> <p>15 Maria is salary, so I don't</p> <p>16 think she's going to get a bonus. Maybe she</p> <p>17 will, I don't know.</p> <p>18 Q Do Maria or Ted have any</p> <p>19 entitlement to profits from Standard U.S.A.?</p> <p>20 A I don't understand the</p> <p>21 question.</p> <p>22 Q That's okay.</p> <p>23 Maria and Ted are part owners</p> <p>24 of Standard U.S.A., is that correct?</p> <p>25 A I believe so.</p>	<p style="text-align: right;">Page 104</p> <p>1 RYAN MEDRANO</p> <p>2 copy.</p> <p>3 Q You say you would have to</p> <p>4 look at the operating agreement. So you</p> <p>5 have seen it at some point?</p> <p>6 A I think so, but I'm not sure.</p> <p>7 Q If you had seen it, when</p> <p>8 would that have been?</p> <p>9 A Probably after it was formed.</p> <p>10 Q And how do you know the</p> <p>11 operating agreement exists if you haven't</p> <p>12 seen it?</p> <p>13 A Because I know.</p> <p>14 MR. NATHAN: Strike that.</p> <p>15 You didn't testify that you hadn't</p> <p>16 seen it.</p> <p>17 Q If you are not sure whether</p> <p>18 you've seen it or not, how do you know the</p> <p>19 operating agreement exists?</p> <p>20 A Well, by dealing with these</p> <p>21 people, I would say that an operating</p> <p>22 agreement, every entity has to have one.</p> <p>23 So I'm assuming they have it.</p> <p>24 Why would they stop? It would be out of</p> <p>25 character for them.</p>
<p style="text-align: right;">Page 103</p> <p>1 RYAN MEDRANO</p> <p>2 Q Does their ownership stake,</p> <p>3 as far as you know, does their ownership</p> <p>4 stake entitle them to any share of</p> <p>5 Standard's profits?</p> <p>6 A I have to read the operating</p> <p>7 agreement. I should probably read that</p> <p>8 through.</p> <p>9 Q And Standard has an operating</p> <p>10 agreement, is that correct?</p> <p>11 A I believe so.</p> <p>12 Q And do you have a copy of the</p> <p>13 operating agreement?</p> <p>14 A I would have to look. I</p> <p>15 don't know if they sent me a copy or not.</p> <p>16 Q Okay.</p> <p>17 A I know one exists, so --</p> <p>18 Q Are there any other legal</p> <p>19 documents or are there any documents of any</p> <p>20 kind that would detail the members of</p> <p>21 Standard U.S.A.'s respective entitlement to</p> <p>22 profits?</p> <p>23 A It's only the operating</p> <p>24 agreement, so I would have to look to see if</p> <p>25 I have a copy, or if they could send me a</p>	<p style="text-align: right;">Page 105</p> <p>1 RYAN MEDRANO</p> <p>2 Q Okay.</p> <p>3 When it comes time to pay out</p> <p>4 profit distributions from Standard U.S.A.,</p> <p>5 how do you know how much and to whom you are</p> <p>6 supposed to pay?</p> <p>7 A I don't think I've paid any</p> <p>8 out, but I would have to look, I just don't</p> <p>9 know, without being able to look for the</p> <p>10 operating agreement, if I have it, and if I</p> <p>11 paid anything out.</p> <p>12 Q And if you were asked to pay</p> <p>13 out a profit distribution, would you consult</p> <p>14 the operating agreement before you made the</p> <p>15 payment?</p> <p>16 A I should, but I probably</p> <p>17 didn't. So --</p> <p>18 Q Did you just pay based on</p> <p>19 what they tell you?</p> <p>20 A Correct.</p> <p>21 Q And by they, could that mean</p> <p>22 Mr. Giuliani?</p> <p>23 A No, it's Maria is usually the</p> <p>24 one who tells me.</p> <p>25 Q So generally, or generally or</p>

<p style="text-align: right;">Page 106</p> <p>1 RYAN MEDRANO</p> <p>2 exclusively it would be Maria Ryan who told</p> <p>3 you what to pay?</p> <p>4 A Yes.</p> <p>5 Q And you would pay what she</p> <p>6 told you?</p> <p>7 A Correct. I would just have</p> <p>8 to look -- I don't remember, because I know</p> <p>9 there was something about one of their</p> <p>10 attorneys, I don't know which one, said you</p> <p>11 can't pay him or something like that.</p> <p>12 I don't remember if we paid</p> <p>13 him or not, that's why I would have to look</p> <p>14 at the records.</p> <p>15 Q So you just testified, "I</p> <p>16 would have to look, I don't remember,</p> <p>17 because I know there was something about one</p> <p>18 of their attorneys, I don't know which one,</p> <p>19 said you can't pay him or something like</p> <p>20 that."</p> <p>21 A Yes.</p> <p>22 Q What do you mean by that?</p> <p>23 A They said hold off on any</p> <p>24 payments. I just don't remember which one,</p> <p>25 because he has several attorneys.</p>	<p style="text-align: right;">Page 108</p> <p>1 RYAN MEDRANO</p> <p>2 A I don't know, I don't</p> <p>3 remember which one. Or maybe I talked to</p> <p>4 Maria about it.</p> <p>5 I just remember that that was</p> <p>6 something I had to watch.</p> <p>7 Q Did you regularly communicate</p> <p>8 with Mr. Giuliani's attorneys?</p> <p>9 A Not really, no.</p> <p>10 Q Are you familiar with</p> <p>11 Mr. Giuliani's attorneys?</p> <p>12 A Well, they come and go, so I</p> <p>13 don't really know. Joe is a new one, so.</p> <p>14 Q Was this conversation that</p> <p>15 you are talking about it, was it with Joe?</p> <p>16 A Joe, maybe. I don't know,</p> <p>17 who is the person before him?</p> <p>18 Q Do you know who Ken Carusso</p> <p>19 is?</p> <p>20 A It may have been Ken Carusso.</p> <p>21 Yes, I do know who he is, but I think he</p> <p>22 was -- he was right around that time, so</p> <p>23 maybe he gave instructions. I don't know</p> <p>24 who.</p> <p>25 Q Do you know who Gary Rosen</p>
<p style="text-align: right;">Page 107</p> <p>1 RYAN MEDRANO</p> <p>2 I would just have to look at</p> <p>3 the bank statement to see what happened.</p> <p>4 Q So, just so I understand, one</p> <p>5 of Mr. Giuliani's attorneys told you that</p> <p>6 you could not pay Mr. Giuliani?</p> <p>7 A I believe so, yes.</p> <p>8 Q Do you remember when that</p> <p>9 occurred?</p> <p>10 A I don't know exactly, but I</p> <p>11 think it was right around when Standard</p> <p>12 U.S.A. was in operation.</p> <p>13 Q So, I think you testified</p> <p>14 that Standard U.S.A. was formed September</p> <p>15 2024, is that right?</p> <p>16 A Yes, somewhere around that</p> <p>17 area. It could have been late August, I</p> <p>18 don't know the exact date.</p> <p>19 Q So this conversation that you</p> <p>20 are referring to happened just before</p> <p>21 Standard U.S.A. was formed?</p> <p>22 A No, it was actually</p> <p>23 functioning at that point, I believe.</p> <p>24 Q Do you recall which attorney</p> <p>25 made this comment to you?</p>	<p style="text-align: right;">Page 109</p> <p>1 RYAN MEDRANO</p> <p>2 is?</p> <p>3 A I know, yes, I know Gary</p> <p>4 Rosen's name.</p> <p>5 Q And who is Gary Rosen?</p> <p>6 A He is an attorney.</p> <p>7 Q Is he one of Mr. Giuliani's</p> <p>8 attorneys?</p> <p>9 A I don't know. I thought he</p> <p>10 was a friend, but I don't know if he's a</p> <p>11 paid guy or whatever.</p> <p>12 Q Do you know who David</p> <p>13 Lebkowsky is?</p> <p>14 A No.</p> <p>15 Q Do you know who Gary Fischhoff</p> <p>16 is?</p> <p>17 A I know the name. I don't</p> <p>18 know him.</p> <p>19 I think he was -- was he with</p> <p>20 the Heath Berger firm? Because that's</p> <p>21 another attorney.</p> <p>22 Q What's your understanding of</p> <p>23 who Heath Berger is?</p> <p>24 A A bankruptcy attorney; I</p> <p>25 believe.</p>

<p style="text-align: right;">Page 110</p> <p>1 RYAN MEDRANO</p> <p>2 Q Do you recall if the</p> <p>3 conversation that you had about not paying</p> <p>4 Mr. Giuliani was with any of those</p> <p>5 individuals?</p> <p>6 I can repeat them if you</p> <p>7 need.</p> <p>8 A I don't know if -- I think</p> <p>9 Maria told me.</p> <p>10 Q So Maria told you that</p> <p>11 Mr. Giuliani cannot be paid directly, is</p> <p>12 that accurate?</p> <p>13 A Just I don't think he can be</p> <p>14 paid. I don't recall the conversation, the</p> <p>15 exact wording.</p> <p>16 Q So, just so I'm clear about</p> <p>17 what you do recall, you recall that you had</p> <p>18 a conversation sometime in late August or</p> <p>19 early September, is that about right?</p> <p>20 A In September, I believe</p> <p>21 September, October, maybe, because --</p> <p>22 Q And it was either with</p> <p>23 Mr. Giuliani's attorneys or with Maria Ryan?</p> <p>24 A I believe it was Maria,</p> <p>25 though, yes.</p>	<p style="text-align: right;">Page 112</p> <p>1 RYAN MEDRANO</p> <p>2 Mr. Giuliani money?</p> <p>3 A Does Standard U.S.A. --</p> <p>4 technically, I don't really know. There are</p> <p>5 small profits, but I just would have to</p> <p>6 check to see if it's paid, I don't know.</p> <p>7 Q If Maria Ryan told you to</p> <p>8 hold off paying Mr. Giuliani money, what</p> <p>9 would your understanding then be of the</p> <p>10 obligation to pay Mr. Giuliani going</p> <p>11 forward?</p> <p>12 A I just assume when they say</p> <p>13 it's okay, then it's okay, but up until</p> <p>14 then --</p> <p>15 Q But does that mean that</p> <p>16 Standard U.S.A. owes Mr. Giuliani money in</p> <p>17 the future?</p> <p>18 A I don't know. I would have</p> <p>19 to see the operating agreement, I don't</p> <p>20 really know, I'm not technical.</p> <p>21 Q So let me ask a different</p> <p>22 way.</p> <p>23 Does Mr. Giuliani have any</p> <p>24 entitlement to the profits of Standard</p> <p>25 U.S.A., LLC?</p>
<p style="text-align: right;">Page 111</p> <p>1 RYAN MEDRANO</p> <p>2 Q And the substance of the</p> <p>3 conversation was that you could not pay</p> <p>4 Mr. Giuliani?</p> <p>5 A Right.</p> <p>6 Q And was it any broader, was</p> <p>7 it any more specific than that? Did --</p> <p>8 A No, it was you have to hold</p> <p>9 off, I think, and then that was it. That's</p> <p>10 why I have to look at the bank statements to</p> <p>11 see if I actually paid anything out or not.</p> <p>12 Q When you say paid anything</p> <p>13 out, are we only talking about Standard</p> <p>14 U.S.A.?</p> <p>15 A Correct, at this point. The</p> <p>16 other accounts were closed.</p> <p>17 Q So this conversation that you</p> <p>18 had didn't have to do with Giuliani</p> <p>19 Communications?</p> <p>20 A No; no, that account was</p> <p>21 closed in August.</p> <p>22 Q So it only had to do with</p> <p>23 Standard U.S.A.?</p> <p>24 A Correct.</p> <p>25 Q Does Standard U.S.A. owe</p>	<p style="text-align: right;">Page 113</p> <p>1 RYAN MEDRANO</p> <p>2 A I would have to read the</p> <p>3 operating agreement, but I'm assuming, yes,</p> <p>4 but I shouldn't assume.</p> <p>5 Q Just so your testimony is</p> <p>6 clear, has Standard U.S.A. ever distributed</p> <p>7 profits to Mr. Giuliani or -- Mr. Giuliani</p> <p>8 or anybody else?</p> <p>9 A Not the other two, but I</p> <p>10 would have to look at Giuliani. That's why</p> <p>11 I said I would have to look.</p> <p>12 Q But it's possible as far as</p> <p>13 you know --</p> <p>14 A It's possible, yes.</p> <p>15 Q -- that some profits have</p> <p>16 been distributed?</p> <p>17 A Yes, it's possible; that</p> <p>18 might have triggered the conversation. So</p> <p>19 we will see. I don't recall what happened.</p> <p>20 Q Do you -- so if Maria Ryan or</p> <p>21 anyone, for that matter, told you to hold</p> <p>22 off paying Mr. Giuliani out of Standard</p> <p>23 U.S.A., LLC, what happened to that money?</p> <p>24 A It's in the bank account.</p> <p>25 Q So any -- outside from the</p>

<p style="text-align: right;">Page 114</p> <p>1 RYAN MEDRANO</p> <p>2 bank account, does Standard U.S.A. have any</p> <p>3 other assets?</p> <p>4 A No.</p> <p>5 Q So any of the funds that</p> <p>6 Mr. Giuliani --</p> <p>7 MR. NATHAN: Strike that.</p> <p>8 Q Other than the operating</p> <p>9 agreement and the bank statements, are there</p> <p>10 any other records of Standard U.S.A.'s</p> <p>11 activities?</p> <p>12 A That's it for now, yeah.</p> <p>13 Q Any other financial records?</p> <p>14 A In Quickbooks, yes. I don't</p> <p>15 know.</p> <p>16 Q And when you say Quickbooks,</p> <p>17 are you referring to records that you</p> <p>18 possess?</p> <p>19 A Yes. I just have to -- there</p> <p>20 is some information I had to put in there</p> <p>21 for sure.</p> <p>22 Q And what type of records are</p> <p>23 those?</p> <p>24 A It's an accounting system.</p> <p>25 Q Okay.</p>	<p style="text-align: right;">Page 116</p> <p>1 RYAN MEDRANO</p> <p>2 A Phone call.</p> <p>3 Q Does she ever e-mail you</p> <p>4 about it?</p> <p>5 A Very rarely, but if she's</p> <p>6 sending a contract, maybe she'll do it that</p> <p>7 way.</p> <p>8 Q Does she ever send you text</p> <p>9 messages about it?</p> <p>10 A Rarely.</p> <p>11 Q And why would she be sending</p> <p>12 you contracts for Standard U.S.A.?</p> <p>13 A She is managing it, she's</p> <p>14 managing the company.</p> <p>15 Q And why do you need to have</p> <p>16 the contracts?</p> <p>17 A To have a copy on record.</p> <p>18 Q Why is it important to have a</p> <p>19 copy on record?</p> <p>20 A It's just by law you should</p> <p>21 have a record, so --</p> <p>22 Q Do you have records of all of</p> <p>23 Standard U.S.A.'s contracts?</p> <p>24 A I believe so.</p> <p>25 Q I think you said before that</p>
<p style="text-align: right;">Page 115</p> <p>1 RYAN MEDRANO</p> <p>2 Is that the way that you</p> <p>3 maintain the financial accounts of Standard</p> <p>4 U.S.A.?</p> <p>5 A Yes.</p> <p>6 Q And does anybody else</p> <p>7 maintain the financial accounts for Standard</p> <p>8 U.S.A.</p> <p>9 A No.</p> <p>10 Q So the only records that</p> <p>11 exist of Standard --</p> <p>12 MR. NATHAN: Well, strike</p> <p>13 that.</p> <p>14 Q The only records that you are</p> <p>15 aware of for Standard U.S.A. would be the</p> <p>16 bank statements, the operating agreement, if</p> <p>17 one exists, and the records you maintain in</p> <p>18 Quickbooks, is that accurate?</p> <p>19 A Correct, yes.</p> <p>20 Q Are you aware of Maria Ryan</p> <p>21 maintaining any records for Standard U.S.A.?</p> <p>22 A No.</p> <p>23 Q When you communicate with</p> <p>24 Dr. Ryan about Standard U.S.A., how do you</p> <p>25 communicate with her?</p>	<p style="text-align: right;">Page 117</p> <p>1 RYAN MEDRANO</p> <p>2 you know Gary Rosen. Could you tell me who</p> <p>3 he is?</p> <p>4 A I believe he's a friend of</p> <p>5 Rudy's from the past. I don't know really</p> <p>6 how the relationship or how far back they</p> <p>7 go.</p> <p>8 Q Do you know whether Gary</p> <p>9 Rosen is an attorney?</p> <p>10 A Yes, he's an attorney.</p> <p>11 Q Do you know whether he's done</p> <p>12 any legal work for Mr. Giuliani?</p> <p>13 A I don't know if he's advised</p> <p>14 him, but they are friends, so.</p> <p>15 Q How about for Standard</p> <p>16 U.S.A., LLC?</p> <p>17 A For Standard U.S.A. he</p> <p>18 probably helped him at the beginning, I'm</p> <p>19 assuming.</p> <p>20 I don't really know what</p> <p>21 happened at the beginning.</p> <p>22 Q Why do you assume that he</p> <p>23 helped him at the beginning?</p> <p>24 A Because they needed help, I</p> <p>25 believe, with the legal documents.</p>

<p style="text-align: right;">Page 118</p> <p>1 RYAN MEDRANO</p> <p>2 I didn't -- I wasn't involved</p> <p>3 in that, so --</p> <p>4 Q You mentioned Standard</p> <p>5 U.S.A.'s contracts. To what extent were</p> <p>6 those contracts continuous with legal</p> <p>7 relationships that Giuliani Communications</p> <p>8 had had?</p> <p>9 A I'm sorry, could you --</p> <p>10 Q I will try that one again.</p> <p>11 To what extent did Giuliani</p> <p>12 Communications' contracts continue with</p> <p>13 Standard U.S.A.?</p> <p>14 A They had to sign new</p> <p>15 contracts, that's for sure. Pretty much the</p> <p>16 same.</p> <p>17 Q So you, so when you say</p> <p>18 pretty much the same, what do you mean?</p> <p>19 A Well, if the contract for</p> <p>20 whatever work they are doing, they are still</p> <p>21 doing the same work, just with a different</p> <p>22 entity.</p> <p>23 Q So Standard U.S.A. would do</p> <p>24 the same work as Giuliani Communications</p> <p>25 LLC?</p>	<p style="text-align: right;">Page 120</p> <p>1 RYAN MEDRANO</p> <p>2 Mr. Giuliani could have access to a bank</p> <p>3 account?</p> <p>4 A Well, so he could make a</p> <p>5 living, yes.</p> <p>6 Q When you say make a living,</p> <p>7 what do you mean?</p> <p>8 A Meaning so he could have some</p> <p>9 money to eat and exist.</p> <p>10 Q And why couldn't he do that</p> <p>11 without having a corporate -- excuse me,</p> <p>12 without having an LLC?</p> <p>13 A I just don't think he has</p> <p>14 that much money left, but I don't know. I'm</p> <p>15 not -- I stay out of the day-to-day personal</p> <p>16 stuff.</p> <p>17 Q I guess I am curious. Why</p> <p>18 was it necessary to form an LLC to achieve</p> <p>19 that goal?</p> <p>20 A I don't know. I wasn't privy</p> <p>21 in those start-up meetings.</p> <p>22 Q Are you aware of any reason</p> <p>23 why Mr. Giuliani decided to form a new LLC</p> <p>24 rather than seek to achieve any of these</p> <p>25 goals through -- in his own name?</p>
<p style="text-align: right;">Page 119</p> <p>1 RYAN MEDRANO</p> <p>2 A Well, it's his media,</p> <p>3 whatever he does with his media, that's what</p> <p>4 it's handling.</p> <p>5 Q So, if Standard U.S.A. was</p> <p>6 continuing the same work that Giuliani</p> <p>7 Communications had been doing, why did</p> <p>8 Mr. Giuliani need to set up a new LLC?</p> <p>9 A I don't know. Communications</p> <p>10 was frozen, the account, so how are you</p> <p>11 going to do business?</p> <p>12 Q If Giuliani Communications'</p> <p>13 account was frozen, why couldn't Giuliani</p> <p>14 Communications set up a different account?</p> <p>15 A I don't know. I wasn't privy</p> <p>16 to why this happened the way it happened.</p> <p>17 Q So, to the best of your</p> <p>18 understanding, the reason for forming</p> <p>19 Standard U.S.A., LLC was that Giuliani</p> <p>20 Communications was prevented from continuing</p> <p>21 its business?</p> <p>22 A Yes.</p> <p>23 Q So, to the best of your</p> <p>24 understanding, the reason for forming</p> <p>25 Standard U.S.A., LLC was so that</p>	<p style="text-align: right;">Page 121</p> <p>1 RYAN MEDRANO</p> <p>2 A No, I don't know.</p> <p>3 Q Is Standard U.S.A., LLC's</p> <p>4 bank account currently frozen?</p> <p>5 A No. Not that I know of, so.</p> <p>6 Q Is Standard U.S.A. actively</p> <p>7 transacting in its bank account?</p> <p>8 A Yes.</p> <p>9 Q Has Standard U.S.A. made any</p> <p>10 payments since it has been in existence?</p> <p>11 A Made payments?</p> <p>12 Q Of any kind.</p> <p>13 A Of course. I told you they</p> <p>14 paid business expenses, people that worked</p> <p>15 for them, technology stuff that they rent</p> <p>16 and use.</p> <p>17 Q Okay. But not the profits</p> <p>18 that Mr. Giuliani would be entitled to?</p> <p>19 A I don't think so, but I would</p> <p>20 have to look. Because I remember that</p> <p>21 was -- that became an issue, whether we</p> <p>22 could pay him or not.</p> <p>23 Q Okay. Are you aware of any</p> <p>24 of Mr. Giuliani's personal bank accounts?</p> <p>25 A No, I know of them, but I</p>


<p style="text-align: right;">Page 222</p> <p>1 RYAN MEDRANO</p> <p>2 Do you know what that means?</p> <p>3 A I have no idea what that</p> <p>4 means. Let me make it larger.</p> <p>5 Q Have you ever seen this</p> <p>6 contract before?</p> <p>7 A I have, but I don't know what</p> <p>8 F/S/O means.</p> <p>9 Q Were you involved in the</p> <p>10 negotiation of this contract?</p> <p>11 A No, man, come on, no. Yeah,</p> <p>12 I have no idea.</p> <p>13 I don't know if I have seen</p> <p>14 this contract. This is -- I must have, if I</p> <p>15 am on this e-mail, but I didn't --</p> <p>16 Q Okay. If you look at</p> <p>17 paragraph it 6 -- sorry, 9.</p> <p>18 A 9, okay.</p> <p>19 Q Where it says Cash</p> <p>20 Compensation?</p> <p>21 A Yes.</p> <p>22 Q You see that it provides for</p> <p>23 \$100,000 of compensation payable to Giuliani</p> <p>24 Communications LLC?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 224</p> <p>1 RYAN MEDRANO</p> <p>2 Q So, this document, you agree,</p> <p>3 would have to have been prepared after the</p> <p>4 Parkside account was opened?</p> <p>5 A I think she's -- Maria must</p> <p>6 be a fortune teller. Yeah, I don't see how</p> <p>7 that could possibly be. Hold on.</p> <p>8 Q If you turn to the next page,</p> <p>9 you will see signature lines.</p> <p>10 A Signature lines, yes.</p> <p>11 Q Do you agree with me that</p> <p>12 none of these signature lines are dated?</p> <p>13 A I don't see a date on them,</p> <p>14 no.</p> <p>15 Q So, based on the fact that</p> <p>16 this agreement provides the account number</p> <p>17 for the Parkside account of Giuliani</p> <p>18 Communications, do you think it's more</p> <p>19 likely than not that this document was</p> <p>20 prepared after the Parkside account was</p> <p>21 opened?</p> <p>22 A I believe so; but I'm trying</p> <p>23 to read what she's saying. "Please reach</p> <p>24 out to me" -- so, in her wording, I don't</p> <p>25 know if they want to redo it or what the</p>
<p style="text-align: right;">Page 223</p> <p>1 RYAN MEDRANO</p> <p>2 Q You see that it says \$25,000</p> <p>3 on September 6th, 2021?</p> <p>4 A Yes.</p> <p>5 Q Has that been paid?</p> <p>6 A So, it has to have been,</p> <p>7 Communications had to have been open by '21,</p> <p>8 then.</p> <p>9 Q Well, I want to see if I --</p> <p>10 if you still think that after you finish</p> <p>11 reading this paragraph.</p> <p>12 Do you see 9.2, it says,</p> <p>13 \$75,000, and then it says, "On the time of</p> <p>14 commitment to the second interview, payment</p> <p>15 will be wired to Giuliani Communications at</p> <p>16 Parkside Financial Bank & Trust"?</p> <p>17 A Yes.</p> <p>18 Q And it gives the account</p> <p>19 number?</p> <p>20 A Right.</p> <p>21 Q Does that change your view</p> <p>22 about when this document would have been</p> <p>23 prepared?</p> <p>24 A Yeah, it has to have been --</p> <p>25 Parkside wasn't open until '24, so yeah.</p>	<p style="text-align: right;">Page 225</p> <p>1 RYAN MEDRANO</p> <p>2 deal is, but timing-wise, it's a little odd</p> <p>3 for sure.</p> <p>4 Q Well, would it have been</p> <p>5 possible for that document to have been</p> <p>6 prepared with that information in 2021?</p> <p>7 A Yeah, I mean that account</p> <p>8 wasn't open, so --</p> <p>9 Q So would it have been</p> <p>10 possible for that document to have been</p> <p>11 prepared and include the account information</p> <p>12 in 2021?</p> <p>13 A No, I don't think so.</p> <p>14 Q So you would agree with me</p> <p>15 that there is no possibility that the</p> <p>16 contract attached to this e-mail dates to</p> <p>17 the original 2021 deal?</p> <p>18 A Well, the only thing I can</p> <p>19 think of is maybe they found the contract</p> <p>20 and then they added in that line.</p> <p>21 Q Okay. So the only way that</p> <p>22 that information could have been included in</p> <p>23 the original contract is if it was added to</p> <p>24 the contract after the fact?</p> <p>25 A Right, right. Or even</p>

<p style="text-align: right;">Page 226</p> <p>1 RYAN MEDRANO</p> <p>2 Giuliani Communications wasn't opened and it</p> <p>3 might have been GP that he was getting paid</p> <p>4 through, I don't know.</p> <p>5 So I don't know the answer to</p> <p>6 that.</p> <p>7 Q Okay. And do you recall</p> <p>8 whether the \$75,000 was wired to Giuliani</p> <p>9 Communications?</p> <p>10 A Yes. That I remember.</p> <p>11 Q And it was wired to Giuliani</p> <p>12 Communications?</p> <p>13 A Yeah; yes.</p> <p>14 Q All right. Why don't we go</p> <p>15 to tab 75, this will be Exhibit 15.</p> <p>16 A Okay.</p> <p>17 (The above described document was</p> <p>18 marked Exhibit 15 for identification as of</p> <p>19 this date.)</p> <p>20 Q Do you see this?</p> <p>21 A Not yet, it hasn't pulled up.</p> <p>22 Sorry, there is a delay.</p> <p>23 Q No problem.</p> <p>24 A Yes, this is the Burke Brands</p> <p>25 one.</p>	<p style="text-align: right;">Page 228</p> <p>1 RYAN MEDRANO</p> <p>2 given for Giuliani Communications, 445 Park</p> <p>3 Avenue in New York?</p> <p>4 A Yes, it might have been on</p> <p>5 her letterhead. I don't know why that's</p> <p>6 there.</p> <p>7 Q I'm sorry, you say you're</p> <p>8 sorry, it might have been on her letterhead?</p> <p>9 A Yes, on this letterhead. I'm</p> <p>10 assuming they used -- someone didn't look at</p> <p>11 it again.</p> <p>12 Q The contract is dated April</p> <p>13 23, 2024?</p> <p>14 A Right.</p> <p>15 Q Do you recall how much money</p> <p>16 was ultimately paid Giuliani Communications</p> <p>17 under this contract?</p> <p>18 A No, not off the top of my</p> <p>19 head, I don't know, but it's probably around</p> <p>20 \$3,000 to \$5,000 a month, starting in May or</p> <p>21 June, I believe.</p> <p>22 Q And are those payments still</p> <p>23 ongoing?</p> <p>24 A Yeah, yes, they are. They</p> <p>25 signed a new contract.</p>
<p style="text-align: right;">Page 227</p> <p>1 RYAN MEDRANO</p> <p>2 Q So you see this as another</p> <p>3 e-mail from Maria Ryan you are copied on the</p> <p>4 e-mail, and attached is a contract between</p> <p>5 Giuliani Communications and Burke Brands?</p> <p>6 A Yes.</p> <p>7 Q Do you see that it also</p> <p>8 includes wire instructions for payment to be</p> <p>9 made to Giuliani Communications?</p> <p>10 A Yes.</p> <p>11 Q Okay. Do you also see up top</p> <p>12 where it recites, "This agreement is between</p> <p>13 Rudolph Giuliani, a/k/a Giuliani</p> <p>14 Communications LLC, and Burke Brands?</p> <p>15 A Yes.</p> <p>16 Q What does that a/k/a mean to</p> <p>17 you?</p> <p>18 A Also known as.</p> <p>19 Q Okay. And in your mind was</p> <p>20 Rudy Giuliani also known as Giuliani</p> <p>21 Communications, and vice versa?</p> <p>22 A Well, again, we go back to</p> <p>23 the insurance thing. He's the key man.</p> <p>24 Q Okay.</p> <p>25 Do you see that the address</p>	<p style="text-align: right;">Page 229</p> <p>1 RYAN MEDRANO</p> <p>2 Q They meaning Burke Brands?</p> <p>3 A Yes, correct.</p> <p>4 Q And who did they sign the new</p> <p>5 contract with?</p> <p>6 A Standard U.S.A. LLC.</p> <p>7 Q Is this contract still in</p> <p>8 effect?</p> <p>9 A Not this one. This is the</p> <p>10 old one. The new one is in effect.</p> <p>11 Q Okay.</p> <p>12 How do you know that this one</p> <p>13 is not in effect?</p> <p>14 A How do I know this one is not</p> <p>15 in effect? Because they signed a new</p> <p>16 contract, and it has different wiring</p> <p>17 instructions, it has a different bank.</p> <p>18 Q Do you have a copy of the new</p> <p>19 contract?</p> <p>20 A I would have to look, yeah.</p> <p>21 Q Does Giuliani Communications</p> <p>22 continue to have an interest in the revenues</p> <p>23 generated for Mr. -- by Mr. Giuliani's work</p> <p>24 for Burke Brands?</p> <p>25 A Does Giuliani Communications</p>

<p style="text-align: right;">Page 230</p> <p>1 RYAN MEDRANO</p> <p>2 have -- I don't believe so.</p> <p>3 Q Was there ever a document</p> <p>4 executed to cancel this contract between</p> <p>5 Giuliani Communications and Burke Brands?</p> <p>6 A I don't know. I don't know</p> <p>7 if Maria generated one or not. I think I</p> <p>8 saw the new contract.</p> <p>9 Q Okay, let's go to tab 95. We</p> <p>10 are going to introduce that as Exhibit 16.</p> <p>11 (The above described document was</p> <p>12 marked Exhibit 16 for identification as of</p> <p>13 this date.)</p> <p>14 A Okay, got it.</p> <p>15 Q You see this is an e-mail</p> <p>16 from -- well, this is an e-mail chain from</p> <p>17 you to Joe Ricci.</p> <p>18 Joe Ricci wrote you on August</p> <p>19 1, 2024 and said, "Hi, Ryan, what address</p> <p>20 are we using for the corporate returns for</p> <p>21 2023?"</p> <p>22 Do you remember him asking</p> <p>23 you that question?</p> <p>24 A Yes, I do.</p> <p>25 Q Why do you think he was</p>	<p style="text-align: right;">Page 232</p> <p>1 RYAN MEDRANO</p> <p>2 will bother him Saturday, when he gets back,</p> <p>3 or you tell me if that's a bad idea."</p> <p>4 Why would it have been a bad</p> <p>5 idea?</p> <p>6 A I try not to bother him about</p> <p>7 this stuff.</p> <p>8 Q Why would Joe Ricci have had</p> <p>9 an opinion as to whether it's a bad idea?</p> <p>10 A We are friends, we talk.</p> <p>11 When a good time, when is a bad time to</p> <p>12 approach someone on a question.</p> <p>13 Q Let's now go to tab 98. This</p> <p>14 will be Exhibit 16, okay.</p> <p>15 A Are you sure it's 16 -- 17,</p> <p>16 I'm sorry. That just popped in.</p> <p>17 Q Thanks for catching that,</p> <p>18 yeah, it's Exhibit 17, thanks.</p> <p>19 (The above described document was</p> <p>20 marked Exhibit 17 for identification as of</p> <p>21 this date.)</p> <p>22 A Yes.</p> <p>23 Q So this is an e-mail from Joe</p> <p>24 Ricci sending you the September invoice.</p> <p>25 And if you look at the attachment, this is</p>
<p style="text-align: right;">Page 231</p> <p>1 RYAN MEDRANO</p> <p>2 asking you that?</p> <p>3 A Because he wanted to know</p> <p>4 which -- where the tax returns should go.</p> <p>5 It should go to his apartment.</p> <p>6 Q Is that because the</p> <p>7 businesses no longer had a physical office?</p> <p>8 A Correct.</p> <p>9 Q And the businesses were being</p> <p>10 run at that point out of his apartment?</p> <p>11 A Yes.</p> <p>12 Q And that would have been his</p> <p>13 New York apartment?</p> <p>14 A I think it was his Florida</p> <p>15 apartment, because that's where we</p> <p>16 changed -- remember we talked about the</p> <p>17 change of address on the corporate returns</p> <p>18 in 2023?</p> <p>19 This is what went to his</p> <p>20 apartment.</p> <p>21 Q And here you say, "I have to</p> <p>22 get RG's address in FL." That's Rudy</p> <p>23 Giuliani's address in Florida?</p> <p>24 A Yes.</p> <p>25 Q And you then continued, "I</p>	<p style="text-align: right;">Page 233</p> <p>1 RYAN MEDRANO</p> <p>2 an invoice for \$4,150 --</p> <p>3 A Yes.</p> <p>4 Q -- to Giuliani Partners at</p> <p>5 the 445 Park Avenue address?</p> <p>6 A Yes, he just hasn't updated</p> <p>7 his thing.</p> <p>8 Q Do you recall whether you</p> <p>9 gave him an updated address prior to him</p> <p>10 sending you this e-mail?</p> <p>11 A I don't know.</p> <p>12 I mean --</p> <p>13 Q So you don't know one way or</p> <p>14 the other whether you had updated the</p> <p>15 addresses on Mr. Giuliani's companies at</p> <p>16 this point?</p> <p>17 A Right, right.</p> <p>18 Q What would be the best way to</p> <p>19 know whether you had or not?</p> <p>20 A You mean how would I know</p> <p>21 that Joe didn't change --</p> <p>22 Q How would you know at what</p> <p>23 point you communicated with Joe about the</p> <p>24 addresses?</p> <p>25 A Oh, well, I thought in the</p>

<p style="text-align: right;">Page 286</p> <p>1 RYAN MEDRANO</p> <p>2 I focused on.</p> <p>3 Q Are you aware of any</p> <p>4 arrangements whereby Mr. Giuliani would be</p> <p>5 compensated for a speaking engagement</p> <p>6 through a payment to Giuliani Defense?</p> <p>7 A No, I don't see those books,</p> <p>8 I never got involved with those things, so I</p> <p>9 don't know.</p> <p>10 Q How about through a payment</p> <p>11 to Giuliani Freedom Fund?</p> <p>12 A No, no. Same thing.</p> <p>13 Q Sorry, go ahead.</p> <p>14 A Well, did you understand what</p> <p>15 I was saying, like at one point I didn't</p> <p>16 know about them, but on the next statement I</p> <p>17 made I knew about them, because I read about</p> <p>18 it.</p> <p>19 Do you understand that from</p> <p>20 the last session?</p> <p>21 Q Yeah, I was just asking</p> <p>22 whether you recalled ever knowing about a</p> <p>23 financial arrangement that would involve</p> <p>24 either Giuliani Defense or the Freedom Fund</p> <p>25 being paid --</p>	<p style="text-align: right;">Page 288</p> <p>1 RYAN MEDRANO</p> <p>2 in this case, have you?</p> <p>3 A I don't believe so, but Joe</p> <p>4 Ricci might have. I think he turned</p> <p>5 something over to a Rachel Goodman. Is she</p> <p>6 at your law firm?</p> <p>7 Q So, are you aware that you</p> <p>8 were served with a subpoena to produce</p> <p>9 documents in this case?</p> <p>10 A No, I would have sent in</p> <p>11 whatever.</p> <p>12 Q Well, let's address that now.</p> <p>13 So let's take a look at tab</p> <p>14 D17, which we can publish as Exhibit --</p> <p>15 A Are you in a new one?</p> <p>16 Q My code with tabs is</p> <p>17 different from your code with the exhibits,</p> <p>18 so you can stay focused on the exhibit</p> <p>19 numbers, but that's going to come up as</p> <p>20 Exhibit 27.</p> <p>21 A Okay.</p> <p>22 (The above described document was</p> <p>23 marked Exhibit 27 for identification as of</p> <p>24 this date.)</p> <p>25 Q Let's take a look at that</p>
<p style="text-align: right;">Page 287</p> <p>1 RYAN MEDRANO</p> <p>2 A No.</p> <p>3 Q -- for Mr. Giuliani's</p> <p>4 services --</p> <p>5 A No.</p> <p>6 Q -- at speaking engagements or</p> <p>7 otherwise?</p> <p>8 A No, not --</p> <p>9 Q Do you recall any</p> <p>10 arrangements where Mr. Giuliani would</p> <p>11 perform services and then payment would be</p> <p>12 sent somewhere other than to Mr. Giuliani,</p> <p>13 Giuliani Communications or Standard U.S.A.,</p> <p>14 just in the last three years?</p> <p>15 A In the last three years? For</p> <p>16 Washington Speakers Bureau.</p> <p>17 Q How about any other services?</p> <p>18 A I would have to look at the</p> <p>19 records. I don't know.</p> <p>20 Q So we have talked a lot today</p> <p>21 about records that you would have to look at</p> <p>22 in order to be able to fully answer the</p> <p>23 questions I've been asking.</p> <p>24 You haven't produced any</p> <p>25 records or other documents to the Plaintiffs</p>	<p style="text-align: right;">Page 289</p> <p>1 RYAN MEDRANO</p> <p>2 together.</p> <p>3 A Okay, I've got it.</p> <p>4 Where do you want me to go?</p> <p>5 Q Well, you can see that this,</p> <p>6 from the docket stamp up top, this is a</p> <p>7 filing on the docket in the Southern</p> <p>8 District of New York.</p> <p>9 If you go to page 2, you will</p> <p>10 see that this is an e-mail from Annie</p> <p>11 Houghton-Larsen to you at your Giuliani</p> <p>12 Partners e-mail address.</p> <p>13 A Okay.</p> <p>14 Q It lists two attachments, but</p> <p>15 the content of the e-mail informs you that</p> <p>16 the court entered an order permitting</p> <p>17 Plaintiffs to serve you by alternative</p> <p>18 methods, that that order is attached, and</p> <p>19 also a Rule 45 subpoena for documents that's</p> <p>20 returnable on December 18th.</p> <p>21 A Oh, shit, sorry.</p> <p>22 Q You agree that that's what</p> <p>23 this e-mail says?</p> <p>24 A Yes, it says right there, I'm</p> <p>25 looking at it.</p>

<p style="text-align: right;">Page 290</p> <p>1 RYAN MEDRANO</p> <p>2 Q So let's now take a look at</p> <p>3 tab D18, and we can mark that as Exhibit 28.</p> <p>4 (The above described document was</p> <p>5 marked Exhibit 28 for identification as of</p> <p>6 this date.)</p> <p>7 A Okay.</p> <p>8 Q Now, Exhibit 28 is another</p> <p>9 document that's been filed on the docket in</p> <p>10 the Southern District of New York.</p> <p>11 And if you flip to the second</p> <p>12 page, do you see that this is a subpoena</p> <p>13 issued in the Freeman versus Giuliani</p> <p>14 matter?</p> <p>15 A Yes.</p> <p>16 Q And you see that it's issued</p> <p>17 to you?</p> <p>18 A Yes, I see Ryan Medrano, I</p> <p>19 Irving Plaza. I didn't see this until now.</p> <p>20 Q This is the first time you're</p> <p>21 seeing this document?</p> <p>22 A Yes, yes.</p> <p>23 Q And you see that it's dated</p> <p>24 December 4, 2024?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 292</p> <p>1 RYAN MEDRANO</p> <p>2 trip, but -- when is this due? I know it's</p> <p>3 past due, but when can I -- when is the next</p> <p>4 time I can have it due, like a week from now</p> <p>5 or something like that?</p> <p>6 Q Yeah, are you willing to</p> <p>7 search and then -- search for and then</p> <p>8 produce documents responsive to this</p> <p>9 subpoena within seven days of today?</p> <p>10 A I didn't look at what they</p> <p>11 are all asking for, but ideally, yes. But I</p> <p>12 didn't read through what they could be</p> <p>13 asking for, the moon, and I would be in</p> <p>14 trouble.</p> <p>15 Can I get back to you?</p> <p>16 Q Can you assure me now that</p> <p>17 you will make every effort to search for and</p> <p>18 produce every document in your possession or</p> <p>19 control that's responsive to this subpoena</p> <p>20 within seven days, which is by January 6,</p> <p>21 2024?</p> <p>22 And then, if that's not</p> <p>23 possible for some reason, that you will let</p> <p>24 us know promptly?</p> <p>25 A Yes. Who do you want me to</p>
<p style="text-align: right;">Page 291</p> <p>1 RYAN MEDRANO</p> <p>2 Q Okay. And the production</p> <p>3 deadline that's given is December 18, 2024?</p> <p>4 A Right.</p> <p>5 Q Okay. So since you haven't</p> <p>6 seen this document until just now, am I</p> <p>7 right that you have not taken any steps to</p> <p>8 comply with this subpoena?</p> <p>9 A No, I have not.</p> <p>10 I just -- the attorney said I</p> <p>11 didn't -- I wasn't involved in this, so --</p> <p>12 Q Okay.</p> <p>13 A I'm sorry.</p> <p>14 Q Did you take any steps to</p> <p>15 search for documents that would be</p> <p>16 responsive to this subpoena?</p> <p>17 A No, but if I have to, I have</p> <p>18 to. So, I'm sorry, I didn't -- I am seeing</p> <p>19 it right now.</p> <p>20 Q Okay, do you intend to comply</p> <p>21 with this subpoena?</p> <p>22 A Yeah.</p> <p>23 Q When do you intend to comply</p> <p>24 with it?</p> <p>25 A I was planning on taking a</p>	<p style="text-align: right;">Page 293</p> <p>1 RYAN MEDRANO</p> <p>2 contact in your office?</p> <p>3 Q You can e-mail me directly.</p> <p>4 My e-mail address is anathan@Wilkie.com.</p> <p>5 And going forward, is the</p> <p>6 best way to reach you personally through</p> <p>7 your Gmail address?</p> <p>8 A Yes.</p> <p>9 A Or through your Giuliani --</p> <p>10 A Yes, that I check,</p> <p>11 Medranoryan I check.</p> <p>12 Q Medranory@gmail.com?</p> <p>13 A Yes.</p> <p>14 Q The court has authorized</p> <p>15 e-mail service on you at the Giuliani</p> <p>16 Partners e-mail address.</p> <p>17 In addition to that, we will,</p> <p>18 going forward, we will include the Gmail</p> <p>19 address, even though under the court's</p> <p>20 order, service on the Giuliani Partners</p> <p>21 address would be sufficient.</p> <p>22 A Okay.</p> <p>23 Q So, just to confirm our</p> <p>24 understanding, by January 6, 2024 we will</p> <p>25 expect a complete production of documents</p>

<p style="text-align: right;">Page 294</p> <p>1 RYAN MEDRANO</p> <p>2 from you that's responsive documents to that</p> <p>3 subpoena.</p> <p>4 If you're unable to meet that</p> <p>5 deadline, could you please let us know by</p> <p>6 January --</p> <p>7 A You will know by Friday,</p> <p>8 because I will have a good grasp of what I</p> <p>9 have to get to you, so.</p> <p>10 Q Okay. So by Friday, January</p> <p>11 3rd, you will let us know if it's not</p> <p>12 possible to meet our deadline of January</p> <p>13 6th?</p> <p>14 A Yes.</p> <p>15 Q Thank you, Mr. Medrano.</p> <p>16 Because we haven't received</p> <p>17 documents from you, I'm going to hold this</p> <p>18 deposition open, and we may need to return</p> <p>19 to this deposition once we have reviewed</p> <p>20 those documents or seek further relief from</p> <p>21 the court to schedule another deposition</p> <p>22 with you if that's necessary.</p> <p>23 Before I wrap up, I would</p> <p>24 just like to ask you are there any of your</p> <p>25 answers today that you would like to change</p>	<p style="text-align: right;">Page 296</p> <p>1 RYAN MEDRANO</p> <p>2 will be in touch if that changes.</p> <p>3 A Yes, so I can just go off</p> <p>4 this, the document you just posted? Just</p> <p>5 use that?</p> <p>6 Q If you would like, we will</p> <p>7 send, as a courtesy, another copy of it. It</p> <p>8 will be the same document that you've just</p> <p>9 reviewed.</p> <p>10 A I can just print this one</p> <p>11 out, though.</p> <p>12 Q You're welcome to do that,</p> <p>13 and we will follow up and confirm by e-mail.</p> <p>14 A Okay.</p> <p>15 Q Thank you, Mr. Medrano, for</p> <p>16 your time.</p> <p>17 A Have a good day.</p> <p>18 THE VIDEOGRAPHER: We are off</p> <p>19 the record at 3:24 p.m., and this</p> <p>20 concludes today's testimony given by</p> <p>21 Ryan Medrano.</p> <p>22 The total number of media</p> <p>23 used was 5 and will be retained by</p> <p>24 Veritext.</p> <p>25</p>
<p style="text-align: right;">Page 295</p> <p>1 RYAN MEDRANO</p> <p>2 or modify?</p> <p>3 Has your recollection</p> <p>4 changed? Has everything you have told me --</p> <p>5 is everything you have told me still your</p> <p>6 best testimony?</p> <p>7 So I will take those in</p> <p>8 order.</p> <p>9 Is there anything about the</p> <p>10 answers you have given to me today that you</p> <p>11 would like to change?</p> <p>12 A Not that I can recall, but I</p> <p>13 haven't really thought too deeply. If I do,</p> <p>14 then I will call you.</p> <p>15 Q And sitting here today, your</p> <p>16 testimony has been your best testimony</p> <p>17 you've been able to give?</p> <p>18 A Yes.</p> <p>19 Q All right. Well, I will hold</p> <p>20 the deposition open for the reasons stated,</p> <p>21 and if we need to revisit anything we have</p> <p>22 discussed after receiving your documents, we</p> <p>23 will do so.</p> <p>24 Otherwise, I don't have any</p> <p>25 further questions for you right now, and we</p>	<p style="text-align: right;">Page 297</p> <p>1 RYAN MEDRANO</p> <p>2</p> <p>3</p> <p>4 I, the undersigned, a</p> <p>5 Certified Shorthand Reporter of the</p> <p>6 State of New York, do hereby</p> <p>7 certify:</p> <p>8 That the foregoing</p> <p>9 proceedings were taken before me at</p> <p>10 the time and place herein set forth;</p> <p>11 that any witnesses in the foregoing</p> <p>12 proceedings, prior to testifying,</p> <p>13 were duly sworn; that a record of</p> <p>14 the proceedings was made by me using</p> <p>15 machine shorthand which was</p> <p>16 thereafter transcribed under my</p> <p>17 direction;</p> <p>18 That the foregoing transcript</p> <p>19 is a true record of the testimony</p> <p>20 given.</p> <p>21 Further, that if the</p> <p>22 foregoing pertains to the original</p> <p>23 transcript of a deposition in a</p> <p>24 federal case before completion of</p> <p>25 the proceedings, review of the</p> <p>transcript [] was [x] was not requested.</p> <p>I further certify I am neither financially interested in the action nor a relative or employee of any attorney or party to this action.</p> <p>IN WITNESS WHEREOF, I have this date subscribed my name.</p> <p></p> <p>Stephen J. Moore RPR, CRR</p>

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